

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

VIRGIL ARMSTRONG,

Plaintiff,

vs.

DEPUTY C. WHALEN, et al.,

Defendants.

NO. C18-00845-JCC

STIPULATION AND [PROPOSED]  
ORDER TO DISMISS ALL CLAIMS

**NOTE ON MOTION CALENDAR:  
Wednesday, March 3, 2021**

**STIPULATION**

COMES NOW Plaintiff Virgil Armstrong, by and through his attorney, John J. Kannin of Kannin Law Firm, and Defendants Snohomish County, Deputy Carl Whalen, Deputy Chad Daugherty, Deputy Kore Oyetuga, and Former Snohomish County Sheriff Robert “Ty” Trenary, by and through their attorney, Deputy Prosecuting Attorney Deborah A. Severson, hereby

1 stipulate and agree that all pending claims in this case shall be dismissed by the Court with  
2 prejudice and without costs or fees to any party.

3  
4 DATED this 3<sup>rd</sup> day of March, 2021.

5 ADAM CORNELL  
6 Snohomish County Prosecuting Attorney

7  
8 By: s/ Deborah A. Severson  
9 DEBORAH A. SEVERSON, WSBA #35603  
10 Deputy Prosecuting Attorney  
11 Snohomish County Prosecutors Office  
12 3000 Rockefeller Ave., M/S 504  
13 Everett, WA 98201-4046  
14 Tel: (425) 388-6330 / Fax: (425) 388-6333  
15 [deborah.severson@co.snohomish.wa.us](mailto:deborah.severson@co.snohomish.wa.us)

16  
17 *Attorney for Defendants Snohomish County,*  
18 *Deputies Whalen, Daugherty, Oyetuga, and*  
19 *Former Snohomish County Sheriff Robert Ty*  
20 *Trenary*

DATED this \_3rd\_ day of March,

2021. KANNIN LAW FIRM, P.S.

By: s/John J. Kannin IV  
JOHN J. KANNIN IV, WSBA #27315  
119 SW 152<sup>nd</sup> Street  
Burien, WA 98166  
Tel: (206) 574-0202  
[john@kanninlaw.com](mailto:john@kanninlaw.com)  
*Attorney for Plaintiff Virgil Armstrong*

**ORDER**

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that all claims by and between the parties in this case be dismissed with prejudice and without costs or fees to any party.

DATED this \_\_\_\_ day of \_\_\_\_\_, 2021.

HONORABLE JOHN C. COUGHENOUR  
United States District Court Judge

Approved as to Form and Content:

ADAM CORNELL  
Snohomish County Prosecuting Attorney

By: s/ Deborah A. Severson  
DEBORAH A. SEVERSON, WSBA #35603  
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*Attorney for Defendants Snohomish County,  
Whalen, Daugherty, Oyetuga, and Trenary*

KANNIN LAW FIRM, P.S.

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[john@kanninlaw.com](mailto:john@kanninlaw.com)

*Attorney for Plaintiff Virgil Armstrong*

**DECLARATION OF SERVICE**


I declare that I am an employee of the Civil Division of the Snohomish County Prosecuting Attorney, and that I caused to be served the foregoing document on the following party by the method indicated:

John J. Kannin  
Kannin Law Firm, P.S.  
119 SW 152<sup>nd</sup> Street  
Burien, WA 98166  
*Attorney for Plaintiff Virgil Armstrong*

- ☒ E-filed: ***john@kanninlaw.com***  
☐ Facsimile:  
☐ Express Mail  
☐ U.S. Mail  
☐ Hand Delivery  
☐ Messenger Service

I declare under the penalty of perjury of the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

SIGNED this 3<sup>rd</sup> day of March, 2021.

  
\_\_\_\_\_  
Cindy Ryden, Legal Assistant